

Michael S. Elkin (admitted *pro hac vice*)
 Thomas P. Lane (admitted *pro hac vice*)

WINSTON & STRAWN LLP

200 Park Avenue
 New York, New York 10166
 melkin@winston.com
 tlane@winston.com
 (212) 294-6700 (Telephone)
 (212) 294-4700 (Facsimile)

Rebecca Lawlor Calkins SBN 195593
 Erin R. Ranahan SBN 235286

WINSTON & STRAWN LLP

333 South Grand Avenue, 38th Floor
 Los Angeles, CA 90071
 rcalkins@winston.com
 eranahan@winston.com
 (213) 615-1700 (Telephone)
 (213) 615-1750 (Facsimile)

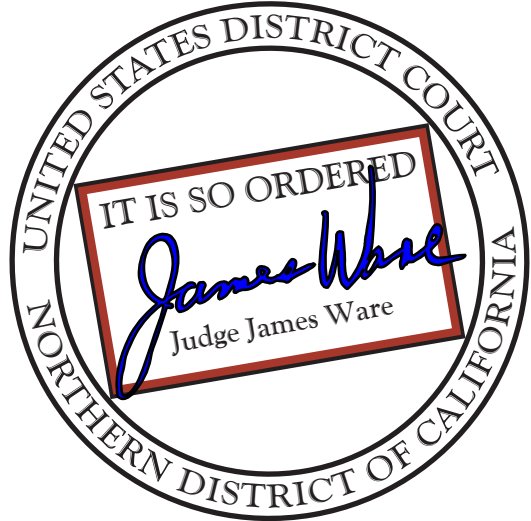
Andrew P. Bridges SBN 122761
 Jennifer A. Golinveaux SBN 203056

WINSTON & STRAWN LLP

101 California Street
 San Francisco, CA 94111
 (415) 591-1506 (Telephone)
 (415) 591-1400 (Facsimile)

Attorneys for Defendants/Counterclaimants

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**



GRATEFUL DEAD PRODUCTIONS, a)
 California corporation, CADESTANSA LLC, a)
 limited liability company on behalf of CARLOS)
 SANTANA, an individual, JIMMY PAGE, an)
 individual, ROBERT PLANT, an individual,)
 JOHN PAUL JONES, an individual,)
 RAYMOND MANZAREK, an individual,)
 ROBBY KRIEGER, an individual, JOHN)
 DENSMORE, an individual, PEARL)
 COURSON, an individual, and GEORGE)
 MORRISON, an individual, FANTALITY)
 CORP., a Colorado corporation, SONY BMG)
 MUSIC ENTERTAINMENT, a Delaware)
 general partnership, BMG MUSIC, a New York)
 partnership, and ARISTA RECORDS, a)
 Delaware LLC,)

Case No. 06-07727 (JW PVT)

**JOINT STIPULATION AND [PROPOSED]
 ORDER TO EXTEND DEADLINE FOR
 DEFENDANTS TO PRODUCE
 RECORDINGS FROM JUNE 9, 2008 TO
 JULY 23, 2008**

Second Amended Complaint Filed:
 October 18, 2007

LA:214745.1

1

1 Plaintiffs,)

2 vs.)

3 WILLIAM E. SAGAN, an individual,)

4 NORTON LLC, a limited liability company,)

5 and BILL GRAHAM ARCHIVES LLC, d/b/a)

 WOLFGANG'S VAULT, a limited liability)

 company,)

6 Defendants,)

7 NORTON LLC, a limited liability company,)

8 BILL GRAHAM ARCHIVES LLC, d/b/a)

9 WOLFGANG'S VAULT, a limited liability)

 company, and WILLIAM E. SAGAN, an)

 individual,)

10 Defendants,)

11 GRATEFUL DEAD PRODUCTIONS, a)

12 California corporation, CADESTANSA LLC, a)

13 limited liability company on behalf of CARLOS)

14 SANTANA, an individual, JIMMY PAGE, an)

 individual, ROBERT PLANT, an individual,)

15 JOHN PAUL JONES, an individual,)

 RAYMOND MANZAREK, an individual,)

16 ROBBY KRIEGER, an individual, JOHN)

 DENSMORE, an individual, PEARL)

17 COURSON, an individual, GEORGE)

 MORRISON, an individual, FANTALITY)

18 CORP., a Colorado corporation, SONY BMG)

 MUSIC ENTERTAINMENT, a Delaware)

19 general partnership, BMG MUSIC, a New York)

 partnership, and ARISTA RECORDS, a)

20 Delaware LLC, ROBERT WEIR, an individual,)

 WARNER MUSIC GROUP CORP., a)

21 Delaware corporation, RHINO)

 ENTERTAINMENT, its subsidiary, and)

22 BRAVADO INTERNATIONAL GROUP,)

 INC., a California corporation,)

23 Counterclaim Defendants.)

24 //

25 //

26 //

27 //

28 //

LA:214745.1

2

STIPULATION AND [PROPOSED] ORDER

Case No. 06-07727 (JW PVT)

Winston & Strawn LLP
333 South Grand Avenue
Los Angeles, CA 90071-1543

1 WHEREAS, on or about November 20, 2007, all parties to this matter filed a Stipulation and
2 Order to Stay Case Until April 1, 2008 to Allow Parties to Devote Time and Energy to Mediate
3 Dispute (Docket #165);

4 WHEREAS on or about December 7, 2007, the Court made the parties' Stipulation the Order
5 of the Court, as modified (Docket #174);
6

7 WHEREAS on or about April 1, 2008, all parties to this matter filed a Stipulation and Order
8 to Continue Stay of Case Until June 2, 2008 to Allow Parties to Devote Additional Time and Energy
9 to Mediate Dispute (Docket #175);

10 WHEREAS on or about April 9, 2008, the Court made the parties' Stipulation the Order of
11 the Court, as modified (Docket # 176);
12

13 WHEREAS the parties have not yet settled the action, but continue to work towards a
14 settlement;

15 WHEREAS Judge Trumbull's November 2, 2007 Order ("November 2 Order") required
16 Defendants to produce certain recordings and audiovisual recordings;

17 WHEREAS all parties reserve their rights with respect to the November 2 Order and its
18 scope and intent;

19 WHEREAS the April 9, 2008 Order set forth a June 9, 2008 deadline for Defendants to
20 produce all audio and audiovisual recordings required by the November 2 Order;
21

22 WHEREAS due to the volume and size of the recordings, the parties have agreed to extend
23 this deadline from June 9, 2008 until July 23, 2008;

24
25
26 //

27 //
28

WHEREAS it is HEREBY STIPULATED AND AGREED, by the parties through their respective counsel, and subject to the approval of this Court, as follows:

1. The deadline for Defendants to produce all audio and audiovisual recordings required by the November 2 Order shall be extended from June 9, 2008, until and including July 23, 2008.

Pursuant to Local Rule 6-2(a), other time modifications that have been entered in this case are set forth in the supporting Declaration of Erin R. Ranahan, filed concurrently herewith.

Dated: June 4, 2008

GIBSON, DUNN & CRUTCHER LLP

WINSTON & STRAWN LLP

By: /s/ Jeffrey H. Reeves
 Jeffrey H. Reeves
 Joshua A. Jessen
 3161 Michelson Drive
 Irvine, California 92612
 (949) 451-3800
 (949) 451-4220 (Facsimile)

By: /s/ Erin R. Ranahan
 Rebecca Lawlor Calkins
 Erin R. Ranahan
 333 South Grand Avenue, 38th Floor
 Los Angeles, CA 90071
 (213) 615-1700 (Telephone)
 (213) 615-1750 (Facsimile)

Attorneys for Plaintiffs/Counter-Defendants

Michael S. Elkin
 Thomas P. Lane
 200 Park Avenue
 New York, New York 10166
 (212) 294-6700
 (212) 294-4700 (Facsimile)

Attorneys for Defendants/Counterclaimants

In accordance with Civil L.R. 5-4 and General Order No. 45(X)(B), I, Erin R. Ranahan, attest under penalty of perjury under the laws of the United States of America that I have the concurrence of the other signatories to this document.

/s/ Erin R. Ranahan
 Erin R. Ranahan

ORDER

Pursuant to the Stipulation above, it is hereby ordered that the deadline for Defendants to produce all audio and audiovisual recordings required shall be extended from June 9, 2008, until and including July 23, 2008.

Dated: June 6, 2008



JUDGE JAMES WARE
UNITED STATES DISTRICT COURT

Winston & Strawn LLP
333 South Grand Avenue
Los Angeles, CA 90071-1543